

**IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

United States Courts  
Southern District of Texas  
FILED

**APR 08 2020**

**LARRY D. FORD**

David J. Bradley, Clerk of Court

**Plaintiff**

4:20-cv-63

**VS**

**AMERICAN HOMES FOR RENT**

**Defendant**

**IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**LARRY D. FORD**

**Plaintiff**

**Civil Action No. \_\_\_\_\_**

**VS**

**AMERICAN HOMES FOR RENT**

**Defendant**

**JURY DEMAND**

**PLAINTIFF ORIGINAL COMPLAINT**

**TO THE HONORABLE JUDGE OF SAID COURT:**

COMES NOW, LARRY D. FORD, PLAINTIFF in the above-styled and numbered cause, complaining of Defendant, AMERICAN HOMES FOR RENT, and in support thereof would respectfully show unto this Honorable Court the following: Plaintiff alleges that, Defendant AMERICAN HOMES FOR RENT, (See exhibit F) has aided in the deliberate leasing of "HOMES FOR RENT" constructed in the Werrington I Sub Division solely for the purpose of renting and placing these properties adjacent to homes of property owners birthing a nightmare of physical violence, drugs, and gun violence. We are senior citizens. There has been gross DECEPTIVE TRADE AND CONSUMER FRAUD. (See EXHIBITS A-F).

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## **I DEFENDANT**

**1.1** **AMERICAN HOMES FOR RENT** is a California Corporation whose registered office is located in California at 30601 Agoura Rd #200, Agoura Hills, CA 91301.

Defendant may be served with process by serving its agent Mark J. Levine at 11 Greenway Plaza, Ste 1400, Houston, Tex. 77046.

## **II. DISCOVERY**

**2.1** Pursuant to Tex. R. Civ. P. 190.3, discovery is intended to be conducted under a Level 3 discovery control plan.

**TEXAS DECEPTIVE TRADE PRACTICES - CONSUMER PROTECTION ACT**, Tex. Bus. & Com. Code Ann. § 17.41, et seq. ("DTPA"), alleges that Defendant has engaged in false, misleading, or deceptive acts or practices in the conduct of trade and commerce as defined in, and declared unlawful by, DTPA sections 17.46(a) and (b).

**2.2** Plaintiff seeks to enjoin Defendant from further violations of the provisions of the DTPA, pursuant to DTPA § 17.47(a).

**2.3** Plaintiff seeks civil penalties in the amount of \$25,000,000.00 for each act or practice calculated to acquire or deprive money or other property from a consumer in violation of the DTPA, pursuant to DTPA § 17.47(c)(1). In addition, Plaintiff seeks civil penalties minimum \$25,000,000.00 for each

act or practice calculated to acquire or deprive money or other property from a consumer aged 65 years or older when the act or practice occurred, pursuant to section 17.47(c)(2).

- 2.4** Plaintiff seeks reasonable attorney's fees and court costs for prosecuting this action, as authorized by Texas Government Code § 402.006(c).

### **III VENUE**

**3.1 A) AMERICAN HOMES FOR RENT:**

This Court has jurisdiction over the lawsuit under 28 U.S.C. § 1332(a)(1), as the Plaintiffs and the Defendant are citizens of different states and the amount in controversy exceeds \$75,000, excluding interest and costs.

Venue lies in Harris County, Texas for the following reasons: Defendant is doing business in Harris County. See Tex. Bus. & COM. CODE § 17.47(b). The Defendant's principal place of business is in Harris County Tex. Bus. & Com. Code § 15.002(3).

### **IV WERRINGTON I SUBDIVISION**

- 4.1** Defendant has caused injury, loss and damage to the Werrington I Subdivision and has caused adverse effects to legitimate business enterprises, which lawfully conduct trade and commerce in the State of Texas. This proceeding is in the best interest of the plaintiff as well other Werrington I Sub Division Home and Property Owners in accordance with DTPA § 17.47(a).

**4.2 Pursuant to Texas law, it is illegal to take advantage of the elderly property owners and home owners. See Exhibits (A,B, C)**

- 1) Loss of home sentimental values
- 2) Children, Grand Children, Great Grand Children have extreme fears of visiting 3527 Maris Way.
- 3) Over ten years of life investment lost (3527 Maris Way)
- 4) Over ten years of home maintenance expenditures, property and property taxes lost.
- 5) Lost of safe haven and care giving home (3527 Maris Way) for immobile parent (87 years old - DESEASED).
- 6) Legend Homes Corporation is in violation of the FAIR TRADE ACT.
- 7) Legend Homes Corporation is in violation the FAIR HOUSING ACT.
- 8) Werrington Home Owners Association is in violation of the TEXAS FAIR HOUSING ACT.
- 9) Werrington Home Owners Association is in violation of the FEDERAL DECEPTIVE TRADE ACT.
- 10) Triton New Homes For Rent is in violation of the TEXAS FAIR TRADE ACT.
- 11) Triton New Homes For Rent is in violation of the FEDERAL FAIR HOUSING ACT.

- 12) Triton New Homes For Rent routinely rent homes to transient murderers, violent tenants (neighbors) etc.
- 13) (Familiar to Landlords) Law Enforcement is constantly arresting murderers, drug dealers and boisterous tenants.
- 14) Spectrum Association Management has a history of renting to violent criminals and drug dealers.
- 15) Spectrum Association Management is committed to a very minimum of deed restrictions. **See Exhibits A,B,C**
- 16) American Homes For Rent leases to violent inconsiderate tenants.
- 17) American Homes For Rent leases to known violent tenants with criminals histories.
- 18) **American Homes for Rent** (Invitation Homes, SRP SUB LLC, Waypoint Homes) knowingly lease to tenants engaging in gun violence as well an abundance of subleasing categorically promoting over crowded parking (8-10 vehicles per rental home).
- 19) **American Homes for Rent** (Invitation Homes, SRP SUB LLC, Waypoint Homes) leases to known offenders of the law and constant violators of the Werrington Home Owners Deed Restrictions  
**See Exhibits A, B, C**
- 20) Werrington Home Owners Association is in direct conflict to the term 'HOME OWNERS' deed restrictions. There is less than ten percent HOME OWNERS living in the Werrington 1 Subdivision

the remaining are Home Rentals (**See Exhibit A**).

- 21) Law Enforcement are notified regularly concerning firearms and drugs possession by 'ACROSS THE STREET' tenants.
- 22) Spectrum Association Management has exhibited minimum to no enforcement of DEED RESTRICTIONS (See Exhibits, **A,B,C,D,E**).
- 23) Current Land Lords are constantly promoting unacceptable living conditions by leasing and placing derogatory tenants adjacent to HOME OWNERS.
- 24) Legend Homes Corporation, Blackstone Group, Spectrum Association Management and American Homes For Rent, are responsible for the last ten years medical bills precipitating from fear, violent neighbors, and over ten years of unsafe, violent living conditions created by LAND LORDS and tenants.
- 25) Over ten year of home and property depreciation.

## **V TRADE AND COMMERCE**

- 5.1 Defendant has, at all times described below, engaged in conduct constituting "trade" and "commerce," as those terms are defined in section 17.45(6) of the DTPA.

## **VI. ACTS OF AGENTS**

- 6.1** When it is alleged that Defendant did any act, it is meant that Defendant performed or participated in such act or thing, or Defendant's officers, agents or employees performed or participated the act or thing and were authorized to do so by Defendant.

## **VII. STATEMENT OF FACTS**

- 7.1** On or about December 8, plaintiff entered an agreement to purchase a new home in Werrington Subdivision I, built by Legend Classic Home Builder. Dave Groves an agent of the defendant, Werrington Interest LTD described to the plaintiff a single home owner subdivision; quiet and occupied by home owners only. The plaintiff was sold the property as an "Excellent retirement community" with home owners and property owners subjected to very stringent HOA rules. **See Exhibit C.**

As early as 2010 'NEW HOMES FOR RENT' ensued followed by congested parking, violence, drug raids, law enforcement intervention, and transient home renters moving in and out monthly and yearly. The circumstances should be construed as deceptive, fraud, and dangerous to senior citizens (plaintiff).



## **VIII. INJURY TO PLAINTIFF**

### **Werrington Subdivision – Lot 17, Block 2. Setion 1**

**8.1** Defendant' acts and practices were unlawful and have caused harm to plaintiff. **See Exhibits A,B,C,D, E, F**

**8.2 TEXAS FAIR HOUSING ACT –**

Texas Deceptive Trade Practices – Consumer Protection Act

PROPERTY CODE: TITLE 15. Fair Housing Practices: Chapter 301.

TEXAS FAIR HOUSINT ACT: SUB-CHAPTER A. TITLE PURPOSE, AND DEFINITIONS; Sec. 301.001. SHORT TITLE. This chapter may be cited as the Texas Fair Housing Act. Added by Acts 1993.

**Texas Deceptive Trade Practices-Consumer Protection Act**

**8.3 LEGEND HOMES CORPORATION – THE SELLER**

The construction of the Home is also subject to any changes in plans, specifications, materials, fixtures or methods as are required by federal, state or local government authority, as well as inconsequential adjustments to the plans and specifications by Seller that do no affect the fair market value of the Property or the Home.

## **IX. DISGORGEMENT**

**9.1** Defendant' assets are subject to the equitable remedy of disgorgement.

Defendant should be ordered to disgorge all monies fraudulently taken from plaintiff, together with all of the proceeds, profits, income, interest and accessions thereto. Such disgorgement should be for the plaintiff and other victimized Werrington I Subdivision home owners.

## **X. TRIAL**

**10.1** Plaintiff herein requests a jury trial and tenders the jury fee to the Harris County District Clerk's office pursuant to Tex. R. Civ. P. 216 and IHX. GOV'T. CODE ANN. §51.604.

## **XI. PRAYER**

**11.1** WHEREFORE, PREMISES CONSIDERED, Plaintiff prays that Defendant be cited according to law to appear and answer herein; that after due notice and hearing, a TEMPORARY INJUNCTION be issued; and that after due notice and trial, a PERMANENT INJUNCTION be issued. Plaintiff prays that the Court will issue an ORDER enjoining Defendant, its officers, agents, servants, employees, and any other person in active concert or participation with Defendant from the following:

- A. Taking advantage of any senior purchasing or currently residing in Werrington I Subdivision by the Government's Deceptive Trade Code, by advertising, offering for sale, or selling homes or other necessities among a majority HOME RENTALS.
- B. Violating any regulation, proclamation, declaration pursuant to fair housing practices.
- C. Transferring, concealing, destroying, or removing from the jurisdiction of this Court any books, records, documents, or other written or computer-generated materials relating to Defendant's business currently or hereafter in Defendant's possession, custody, or control except in response to further orders or subpoenas in this cause.
- D. Advertising LEGEND CLASSIS HOMES et. al with intent not to sell them as advertised, but as NEW HOME FOR RENT in an already established subdivision including, but not limited to, advertising homes for sale but negotiating the homes as new homes for rent.

**11.2** Further requests that this Court award damages and restitution of

monies in the amount no less than \$25,000,000.00.

- B. Civil monetary penalties per violation of the DTPA, when the act or practice that acquired or deprived money or other property from consumers who were 65 years of age or older when the act or practice occurred, pursuant to DTPA § 17.47(c)(2);
- C. Pre-judgment and post-judgment interest on all awards of restitution, damages, or civil penalties, as provided by law;
- D. All costs of Court, costs of investigation, and reasonable attorney's fees pursuant to Texas Government Code § 402.006(c).

**11.3** Plaintiff prays for all further relief, at law or inequity, to which it is justly entitled.

**Respectfully Submitted,**

**Larry D. Ford  
3527 Maris Way  
Humble, Tx 77338  
281-636-0317**

# EXHIBIT A

Larry and Barbara Ford  
3527 Maris Way  
Humble, Texas 77338

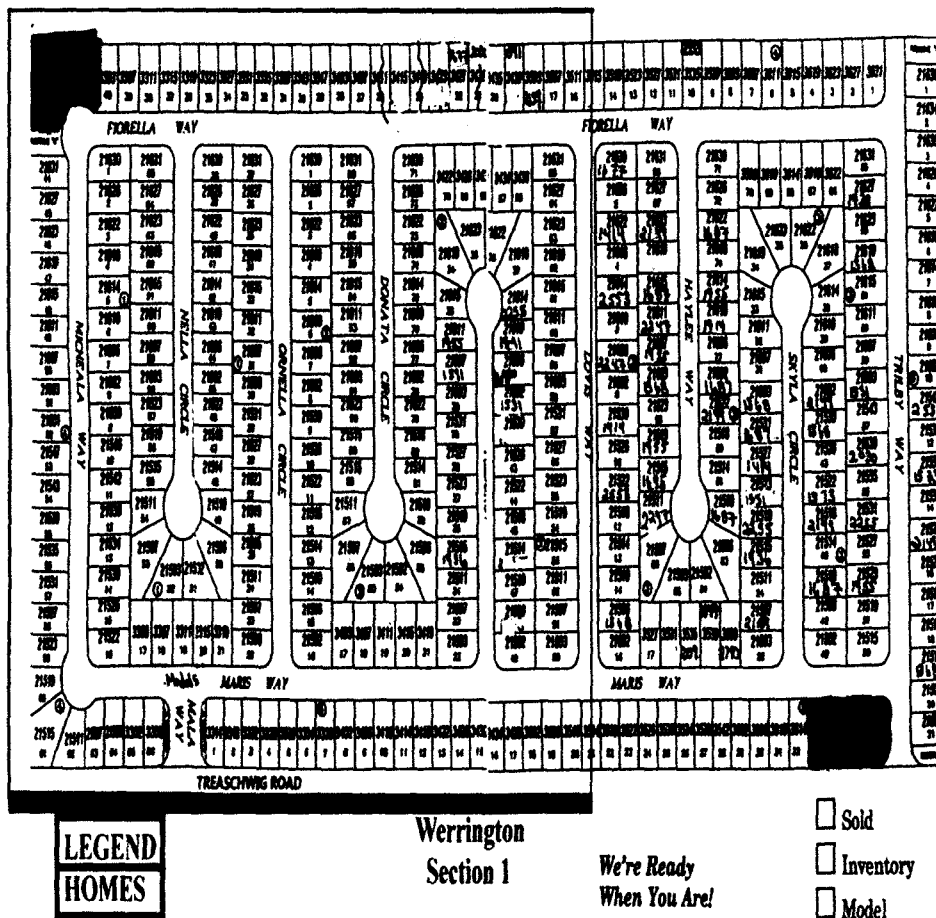
## Homeowner Complaint

281-636-0317

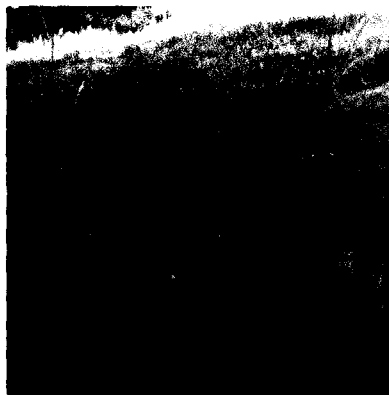
## FINAL NOTICE

Spectrum AM Management  
Waypoint Management  
Invitation Management

**OVER 90% RENTAL HOMES (ENCLOSED IN RED)**







24 hrs truck on lawn 3527 Maris Way



Two trucks in front of 3527 Maris Way

Spectrum Management, Waypoint Management, and Invitation Management have by inaction and lack of enforcement allowed the one tenant at **3526 Maris Way**, Humble, Texas, 77338 to abuse and deface our private property by continuing to park his flatbed truck in front of our property. He repeats that no one can tell him where to park his flatbed truck (AAA). Please see photos.

Over the past 1.5 years these management entities ( Spectrum AM et al)have done nothing to discourage this and other tenants from parking their vehicles directly in front of our home and leaving them for days. (Please come by and observe for yourself.) Our lawn is our pride and joy as well as our home). It is common knowledge that these flatbed trucks and vehicles would never be tolerated parking in front of homes in a white middle class subdivision.

We are 65 years of age, USA citizens and retired. We are afraid most of the times. Having had guns pointed at us (by prior tenants and current tenants both living at **3526 Maris Way**) then firing their guns into the ground; there are records of 911 calls and police presence. We will have no other choice if your tenants continue to disrespect our property than to legally request 4.3 million dollars for pain, suffering, depreciation and relocation. We have lived at 3527 over 13 years. These confrontations from **3526 Maris** have been ongoing for nearly four years. There seems to be no communication between HOA, property management and the tenants of 3526 Maris Way, Humble Texas, 77338. Please investigate. There is a flow of ten or more vehicles at this **3526 Maris Way** location; overnights and for long periods of time. (Does HOA SPECTRUM AM care?)

Sincerely,  
Larry and Barbara Ford

281-636-0317

Werrington Homeowners Association Inc  
Spectrum Association Management  
Kathryn Crow – Site Manager  
16690 Park Row Dr.  
Houston, Tx 77084  
[contact@spectrumam.com](mailto:contact@spectrumam.com)  
[kcrow@spectrumam.com](mailto:kcrow@spectrumam.com)  
Kathryn Crow  
281-343-9178

Spectrum Association Mgmt LP  
1001 S. Dairy Ashford Rd # 380  
281-343-9178

Invitation Homes  
3730 Kirby Dr. Suite 104  
Houston, Tx 77098  
866-990-2441

Waypoint Homes  
5507 Louetta Rd. Suite C  
Spring, Texas 77379  
[residents@waypointhomes.com](mailto:residents@waypointhomes.com)

Waypoint Homes  
9305 E Via de Ventura Suite 201  
Scottsdale, AZ 85258-7807  
[residents@waypointhomes.com](mailto:residents@waypointhomes.com)

SRP SUB LLC  
1717 Main St. STE 2000  
Dallas Tx 75201-4057

SRP SUB LLC  
8665 E Hartford Drive  
Scottsdale AZ 85255-7807



CAH 2015-1 Borrower LLC  
8665 E. Hartford Dr. Ste 200  
Scottsdale, AZ, 85255-7807

**Texas Realtor Association**

info@texasrealtors.com  
1115 San Jacinto Blvd. Ste 200  
Austin, TX 78701-1906  
512-480-8200

TEXAS APARTMENT ASSOCIATIONM  
ATTN: CHRIS NEWTON  
EXECUTIVE VICE PRESIDENT  
chris@taa.org

Texas Apartment Association  
1011 San Jacinto Blvd., Suite 600  
Phone: 512-479-6252  
FAX 512-479-6291

FEDERAL TRADE COMMISSION  
600 Pennsylvania Avenue, NW  
Washington, DC 20580  
202-326-2222

CONSTITUTION CENTER  
FEDERAL TRADE COMMISSION  
400 7<sup>TH</sup> ST. SW  
Washington, DC 20024  
202-326-2222

HUD  
U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
451 7<sup>TH</sup> STREET S.W.  
WASHINGTON, C 20410  
202-708-1112

WAYPOINT HOMES  
ATTN: FREDERICK C TUOMI  
8665 E HARTFORD DRIVE  
SCOTTSDALE, AZ 85255  
480-800-3300

1-855-224-5484

WAYPOINT HOMES  
5517 LOUETTA RD #B  
SPRING, TX 77379  
832-559-8583

WAYPOINT HOMES  
2760 Aurora Ave # 100  
Naperville, IL 60540

WAYPOINT HOMES  
4010 W Boy Scout Blvd # 580  
Tama, FL 33607

COLFIN AI-TX 1 LLC  
2450 BROADWAY, 6<sup>TH</sup> FLOOR  
SANTA MONICA, CA 90404-3570

COLFIN AI-TX 1, LLC  
515 S FLOWER ST  
LOS ANGELES, CA 90071  
**Better Business Bureau**  
[info@bbbhou.org](mailto:info@bbbhou.org)  
[jshoemaker@bbbhou.org](mailto:jshoemaker@bbbhou.org)  
[eanderson@bbbhou.org](mailto:eanderson@bbbhou.org)  
[abeasley@bbbhou.org](mailto:abeasley@bbbhou.org)  
[kbill@bbbhou.org](mailto:kbill@bbbhou.org)  
[vcartwright@bbbhou.org](mailto:vcartwright@bbbhou.org)  
[mduplechian@bbbhou.org](mailto:mduplechian@bbbhou.org)  
[amartin@bbbhou.org](mailto:amartin@bbbhou.org)  
[rmckissack@bbbhou.org](mailto:rmckissack@bbbhou.org)  
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[nputscher@bbbhou.org](mailto:nputscher@bbbhou.org)  
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[rbarer@bbbhou.org](mailto:rbarer@bbbhou.org)  
[dsalinas@bbbhou.org](mailto:dsalinas@bbbhou.org)  
[styler@bbbhou.org](mailto:styler@bbbhou.org)

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Houston Chronicle

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**FAX 713-663-4648**

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**800-627-1150**

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**FEDERAL GOVERNMENT OFFICE**

**HOUSTON, TX 713-567-9000**

**ATTORNEY GENERAL – CONSUMER PROTECTION DIVISION / GOV. OFFICE**

**HOUSTON, TX 713-223-5886**

**THE ATTORNEY GENERAL OF TEXAS – KEN PAXTON**

**LEGAL SERVICES**  
**HOUSTON, TEXAS 713-973-4300**

**WERRINGTON HOA**  
**[drake@hooverslovaek.com](mailto:drake@hooverslovaek.com)**  
**[ballases@hooveerslovacek.com](mailto:ballases@hooveerslovacek.com)**  
**[cpickett@hooverslovecek.com](mailto:cpickett@hooverslovecek.com)**  
**[pickford@hooverslovacek.com](mailto:pickford@hooverslovacek.com)**  
**[legendhomescorp@gmail.com](mailto:legendhomescorp@gmail.com)**

## EXHIBIT B

Larry & Barbara Ford  
3527 Maris Way  
Humble, Texas 77338  
281-636-0317

### Homeowner Complaint (SECOND NOTICE)

**August 20, 2018**

Werrington Homeowners Association Inc.  
Spectrum Association Management  
16690 Park Row Dr. Houston Tx 77084  
281-343-9178

Atnn:

Kathryn Crow – Site Manager  
Megan Thayer  
David Wilkinson  
Alana Jimenez  
Bart Jones  
Sonia Lecompte  
Troy Lively  
Toni Ryan

'NEW HOMES for RENT' owners and managers have converted our once Dream Home into an apartment parking and living nightmare. I'm sure you are aware that in most apartment complexes its parking on a first come first serve basis. In other words, park wherever you can. Our home is not an apartment. Its common knowledge that if we were a white middle class family our home would never be subjected to such disrespect and defacement of property. **Please see attachment or photos.**

We are afraid for our lives. We are afraid to go outdoors. Yes, we would gladly except a \$400,000. refund to move to a safe a respectable place.

Two of your tenants of 3526 Maris Way used a hand gun to threatened us. They pointed their guns directly at us but fired into the ground. This is a nightmare. The police were called immediately.

We have to wait sometimes days or hours for them to move their vehicles before our lawn can be mowed or watered. **These are your tenants.** Short of a restraining order, please

get it over to them that they are not to park in front of our home or threatened us with guns or violence.

Sincerely,

**Larry & Barbara Ford**  
**281-636-0317**

Larry & Barbara Ford  
3527 Maris  
Humble, Texas 77338  
281-636-0317

August 20, 2018

**Complaint (Home Owner)**

**RE: OVER CROWDED RENTAL HOMES  
LEADING TO OVERCROWDED PARKING  
TOO MANY TENANTS AND VEHICLES PER ONE RENTAL HOME**

3526 Maris Way  
Humble, Texas 77338

Waypoint Homes – Colony Starwood Homes  
Attn: Frederick Tuomi  
8665 E. Hartford Drive  
Scottsdale, AZ 85255  
480-800-3300  
1-855-224-5484

Ryan A. Berry  
Barry S Sternlicht  
Charles D. Young  
Justin T. Chang



**Parked on lawn for over 24 hrs**



**Two trucks in front of lawn**

**Legend Home Builders**

10410 Windermere Lakes Blvd.

Houston, TX 77065

Toll Free: (866) 398-7898

Main: (281) 671-9000

Short of a full refund of our entire home and property investment we would like the decency and respect of 'New Homes for Rent' tenants not to park and obstruct the front of our home. When we purchased our home over ten years ago it was an honest



investment now turned into an almost unlivable nightmare in the name of unsafe, violent, unfriendly, disrespectful rental tenants just across the street.

We were sold this property under contract. Mr. Dave, representative of Legend Home Builders sold us this home at 3527 Maris Way under contract and promised, "There will be no apartment complex or business (Industrial Buildings) in front of our home. Only homes for sale." And now we are asking that the 'New Homes for Rent' tenants please not park their trucks, cars, in front of our home.

A full size pick-up truck, are constantly blocking the view and parking in front of our home. They exit their vehicle on our lawn converting a piece of our lawn into a trail of dead grass. We make an extra effort to keep our lawn and home maintained according to HOA standards..

How does an HOA (We have proof) descend from requesting us to trim our trees, and lawn to allowing 'New Homes for Rent' tenants to deface our property with transportation trucks, large vehicles, cars, and trucks. **'New Homes for Rent'** as they advertise were not a part of our home purchasing agreement as new home owners. We would sincerely like to know if there is in existence a real HOA and is this a legitimate organization? And who really owns these properties? Is Legend Home Builders are Castle Rock Home Builders a part of the Triton 'New Homes for Rent' scheme? We would like to know who gave authorization to construct these 'New Homes for Rent' scams. Most 'New Home for Rent' tenants have been moving in and out of these structures on average every one to two years. And each new tenant is worse than the last.

This is Fraud. This is Home Builder and HOA fraud. Fraudulent on many, many levels. Now, we have proof. Our HOA (WERRINGTON SUBDIVISION) sent us a threatening letter threatening to foreclose our home years ago and another letter (over 10 pages) stating that they have every right to make a profit according to Texas Law, and that the law was on their side. In their words they have every legal right to promote the **SCAM 'New Homes for Rent'**. Short of a full refund on our investment we are simply requesting that you ask the 'New Homes for Rent' tenants at **3526 Maris Way, Maris Way** (Waypoint Home Rentals not to park their trucks and cars in front of our property). We have spoken to other home owners in the Werrington Subdivision and they concur that something has to be done. To start, issuing a policy that the 'New Homes for Rent' tenants park on the side of the street nearest their

homes and no trucks should be allowed to obstruct the two lane streets.

It is most unacceptable to expect homeowners to tolerate not only the living conditions of the 'New Homes for Rent' tenants but daily removing dog feces from our lawn. This is overwhelming. These tenants allow their dogs to do this shockingly as we are looking and witnessing. Shouting "No. No!" to them has done little to stop this. Please address this issue. We did not invest our life saving for this.

Subjectively, the Werrington Subdivision 'New Homes for Rent' tenants' behavior has all the hallmarks of a Black and White component. For example, the White 'New Homes for Rent' tenants are parking their vehicles in front of property of only Black Home Owners. Obviously the White 'New Homes for Rent' tenants are making a clear statement that they have no intentions of respecting Black Home Owners' property. We don't believe Legend, (HOA of the Werrington Subdivision) would have sold these homes to White families and then boldly construct massive rentals just across the street. And now more than 85 percent of the neighborhood is 'New Homes for Rent' tenants. The value of our once valuable home has plummeted. This is a living home owners' NIGHTMARE.

Please respond ASAP.

Sincerely,

Larry & Barbara Ford  
3527 Maris Way  
Humble, Texas 77338  
281-636-0317

It is apparent that the 'Homes for Rent' owners and home rental management were hoping that the landlord-tenant abuse of homeowners would resolve itself or simply disappear. It hasn't. It has gotten worse. The wait and see what happens approach is irresponsible of both property owners and management. There are now additional vehicles including a flatbed impeding not only our home and family members' parking but a constant double parking nightmare.

Would you please consider a full refund for our home and property.

**TEXAS APARTMENT ASSOCIATION**

**Chris Newton**

**Executive Vice President**

*cc: [redacted]*

Texas Apartment Association  
1011 San Jacinto Blvd., Suite 600  
Austin, TX 78701-1951  
Phone: 512.479.6252  
FAX: 512.479.6291

**Federal Trade Commission**

**Headquarters**

Federal Trade Commission  
600 Pennsylvania Avenue, NW  
Washington, DC 20580  
Telephone: (202) 326-2222

**Constitution Center**

Federal Trade Commission  
400 7th St., SW  
Washington, DC 20024  
Telephone: (202) 326-2222

**HUD**

U.S. Department of Housing and Urban Development  
451 7th Street S.W.,  
Washington, DC 20410  
Telephone: (202) 708-1112

Washington, DC 20410  
Telephone: (202) 708-1112

**Texas Realtor Association**  
**512-480-8200**  
Monday-Friday, 8:30 a.m.-5 p.m. Central  
[info@texasrealtors.com](mailto:info@texasrealtors.com)

1115 San Jacinto Blvd., Ste. 200  
Austin, TX 78701-1906

**Better Business Bureau**  
BBB of South Texas  
Dolores Salinas, President  
[dolores.salinas@bbb.org](mailto:dolores.salinas@bbb.org)  
956-968-3678  
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The Washington Post, 1301 K Street NW, Washington DC 20071

Associated Press

877.836.9477 (U.S.)

**US Attorney General**

United States Attorney

Federal Government Office

Houston, TX · (713) 567-9000

Attorney General--Consumer Protection Division

Government Office

Houston, TX · (713) 223-5886

The Attorney General Of Texas Ken Paxton

Legal Services

Houston, TX · (713) 973-4300

## **EXHIBIT C**

Larry & Barbara Ford  
3527 Maris  
Humble, Texas 77338  
281-636-0317

**June 25, 2017**

**RE: OVER CROWDED RENTAL HOMES  
LEADING TO OVERCROWDED PARKING  
TOO MANY TENANTS AND VEHICLES PER ONE RENTAL HOME**

(1) 3526 Maris Way  
Humble, Texas 77338

(2) 3518 Maris Way  
Humble, Texas 77338

### **Complaint (Home Owner)**

It is apparent that the 'Homes for Rent' owners and home rental management were hoping that the landlord-tenant abuse of homeowners would resolve itself or simply disappear. It hasn't. It has gotten worse. The wait and see what happens approach is irresponsible of both property owners and management. There are now additional vehicles including a flatbed impeding not only our home and family members' parking but a constant double parking nightmare.

Would you please consider a full refund for our home and property.

**TEXAS APARTMENT ASSOCIATION**

**Chris Newton**

Executive Vice President

[chris@taa.org](mailto:chris@taa.org)

Texas Apartment Association  
1011 San Jacinto Blvd., Suite 600  
Austin, TX 78701-1951  
Phone: 512.479.6252  
FAX: 512.479.6291

**Federal Trade Commission  
Headquarters**

Federal Trade Commission  
600 Pennsylvania Avenue, NW  
Washington, DC 20580  
Telephone: (202) 326-2222

**Constitution Center**

Federal Trade Commission  
400 7th St., SW  
Washington, DC 20024  
Telephone: (202) 326-2222

**HUD**

U.S. Department of Housing and Urban Development  
451 7th Street S.W.,  
Washington, DC 20410  
Telephone: (202) 708-1112

**Texas Realtor Association**

**512-480-8200**

Monday-Friday, 8:30 a.m.-5 p.m. Central

[info@texasrealtors.com](mailto:info@texasrealtors.com)

1115 San Jacinto Blvd., Ste. 200  
Austin, TX 78701-1906

**Better Business Bureau**

**BBB of South Texas**

Dolores Salinas, President

dsalinas@bbbhou.org

956-968-3678

502 East Expressway 83 Suite C

Weslaco, TX 78596

**Houston Chronicle**

**Breaking News**

(713) 362-7491

news@chron.com

Houston Chronicle

P.O. Box 4260 Houston, TX 77210

713-362-7211

**CBS NEWS**

- Breaking News Tip: (713) 521-4388
- KHOU 11 Investigates: (713) 521-HELP
- Digital News Desk: (713) 284-8720
- Reception Desk: (713) 526-1111

**ABC NEWS**

**KTRK TV**

3310 Bissonnet

Houston, TX 77005

Phone Number: 713-666-0713

Fax Number: 713-663-4648

**NBC NEWS**



8181 Southwest Freeway Houston, TX 77074

KPRC TV PO Box 2222 Houston, TX 77252-2222

## **Washington Post**

202.334.6000 or 800.627.1150.

The Washington Post, 1301 K Street NW, Washington DC 20071

Associated Press

**877.836.9477 (U.S.)**

## **US Attorney General**

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The Attorney General Of Texas Ken Paxton

Legal Services

Houston, TX · (713) 973-4300

## **Legend Home Builders**

10410 Windermere Lakes Blvd.

Houston, TX 77065

Toll Free: (866) 398-7898

Main: (281) 671-9000

Short of a full refund of our entire home and property investment we would like the decency and respect of 'New Homes for Rent' tenants not to park and obstruct the front of our home. When we purchased our home over ten years ago it was an honest investment now turned into an almost unlivable nightmare in the name of unsafe, violent, unfriendly, disrespectful rental tenants just across the street.

We were sold this property under contract. Mr. Dave, representative of Legend Home Builders sold us this home at 3527 Maris Way under contract and promised, "There will be no apartment complex or business (Industrial Buildings) in front of our home. Only homes for sale." And now we are asking that the 'New Homes for Rent' tenants please not park their trucks, cars, or flatbed trucks in front of our home.

A full size pick-up truck, an 18 wheeler, and flatbed trailer are constantly blocking the view and parking in front of our home. They exit their vehicle on our lawn converting a piece of our lawn into a trail of dead grass. We make an extra effort to keep our lawn and home maintained according to HOA standards..

How does an HOA (We have proof) descend from requesting us to trim our trees, and lawn to allowing 'New Homes for Rent' tenants to deface our property with transportation trucks, large vehicles, cars, and trucks. **'New Homes for Rent'** as they advertise were not a part of our home purchasing agreement as new home owners. We would sincerely like to know if there is in existence a real HOA and is this a legitimate organization? And who really owns these properties? Is Legend Home Builders are Castle Rock Home Builders a part of the Triton 'New Homes for Rent' scheme? We would like to know who gave authorization to construct these 'New Homes for Rent' scams. Most 'New Home for Rent' tenants have been moving in and out of these structures on average every one to two years. And each new tenant is worse than the last.

This is Fraud. This is Home Builder and HOA fraud. Fraudulent on many, many levels. Now, we have proof. Our HOA (WERRINGTON SUBDIVISION) sent us a threatening letter threatening to foreclose our home years ago and another letter (over 10 pages) stating that they have every right to make a profit according to Texas Law, and that the law was on their side. In their words they have every legal right to promote the **SCAM 'New Homes for Rent'**. Short of a full refund on our investment we are simply requesting that you ask the 'New Homes for Rent' tenants at **3526 Maris Way**, and **3518 Maris Way** (Waypoint Home Rentals not to park their 18 wheelers, trucks and cars in front of our property). We have spoken to other home owners in the Werrington Subdivision and they concur that something has to be done. To start, issuing a policy that the 'New Homes for Rent' tenants park on the side of the street

nearest their homes and no 18 or 16 wheeler trucks should be allowed to obstruct the two lane streets.

It is most unacceptable to expect homeowners to tolerate not only the living conditions of the 'New Homes for Rent' tenants but daily removing dog feces from our lawn. This is overwhelming. These tenants allow their dogs to do this shockingly as we are looking and witnessing. Shouting "No. No!" to them has done little to stop this. Please address this issue. We did not invest our life saving for this.

Subjectively, the Werrington Subdivision 'New Homes for Rent' tenants' behavior has all the hallmarks of a Black and White component. For example, the White 'New Homes for Rent' tenants are parking their vehicles in front of property of only Black Home Owners. Obviously the White 'New Homes for Rent' tenants are making a clear statement that they have no intentions of respecting Black Home Owners' property. We don't believe Legend, (HOA of the Werrington Subdivision) would have sold these homes to White families and then boldly construct massive rentals just across the street. And now more than 85 percent of the neighborhood is 'New Homes for Rent' tenants. The value of our once valuable home has plummeted. This is a living home owners' NIGHTMARE.

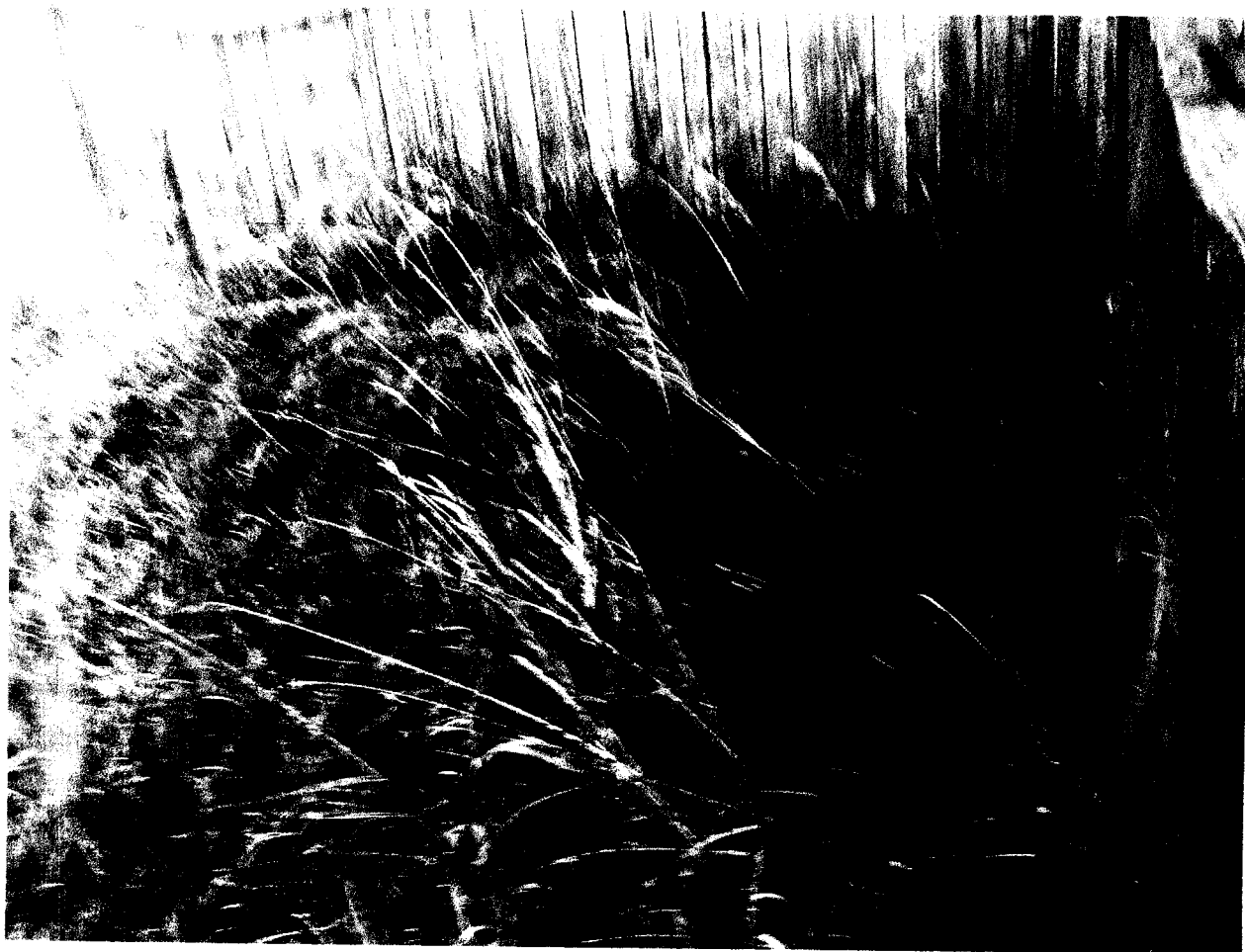
Please respond ASAP.

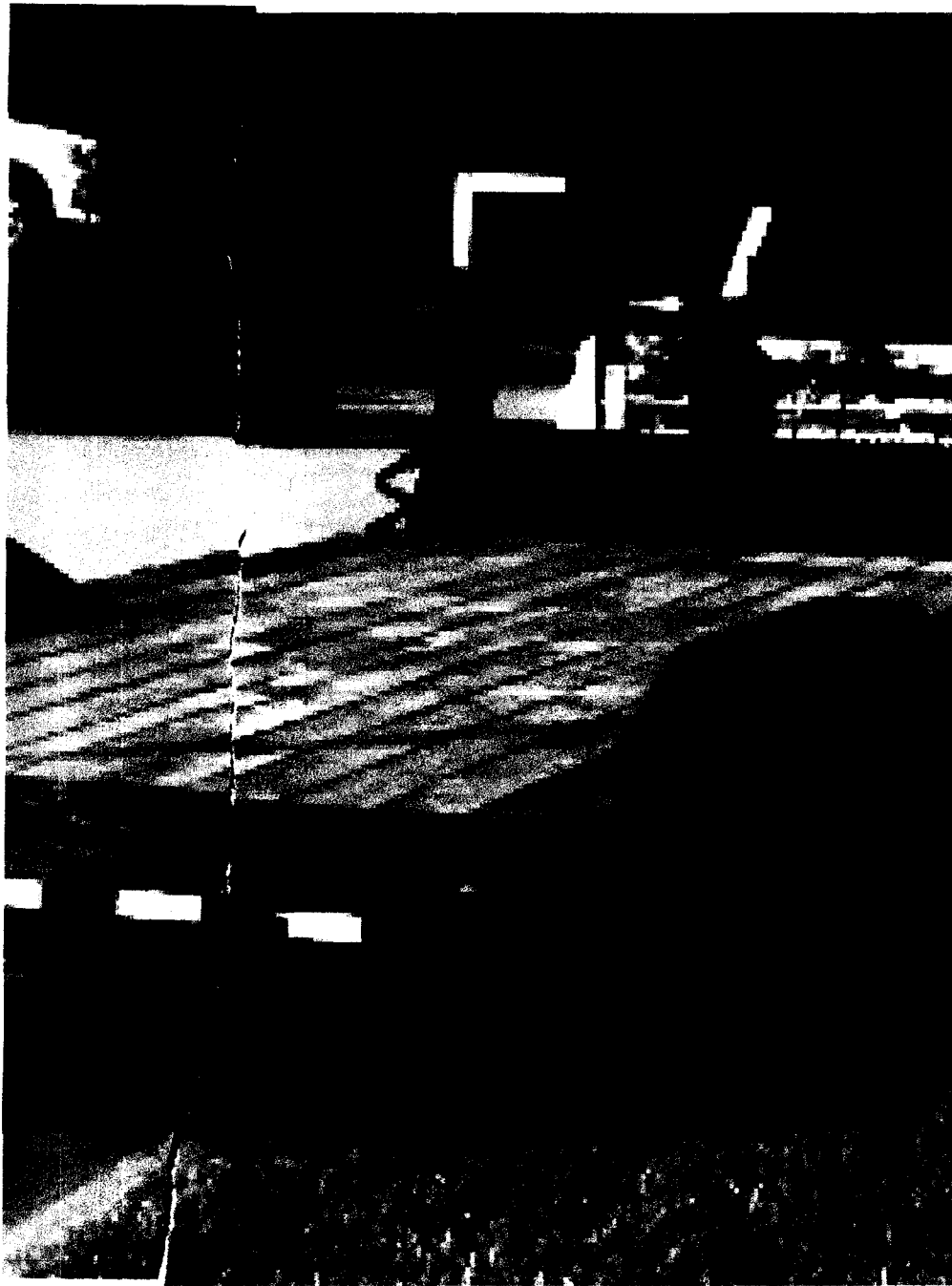
Sincerely,

Larry & Barbara Ford  
3527 Maris Way  
Humble, Texas 77338  
281-636-0317

## EXHIBIT D





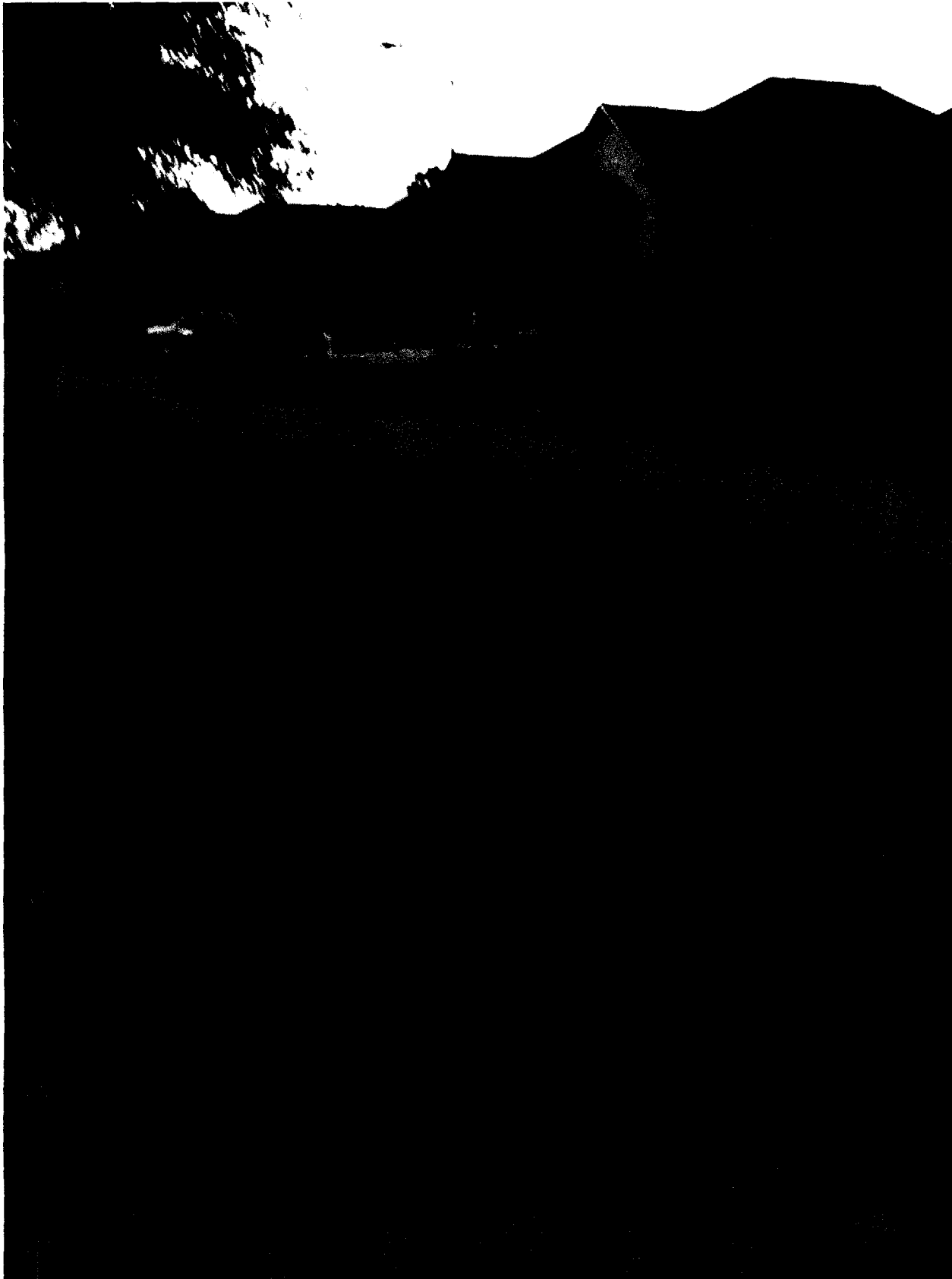






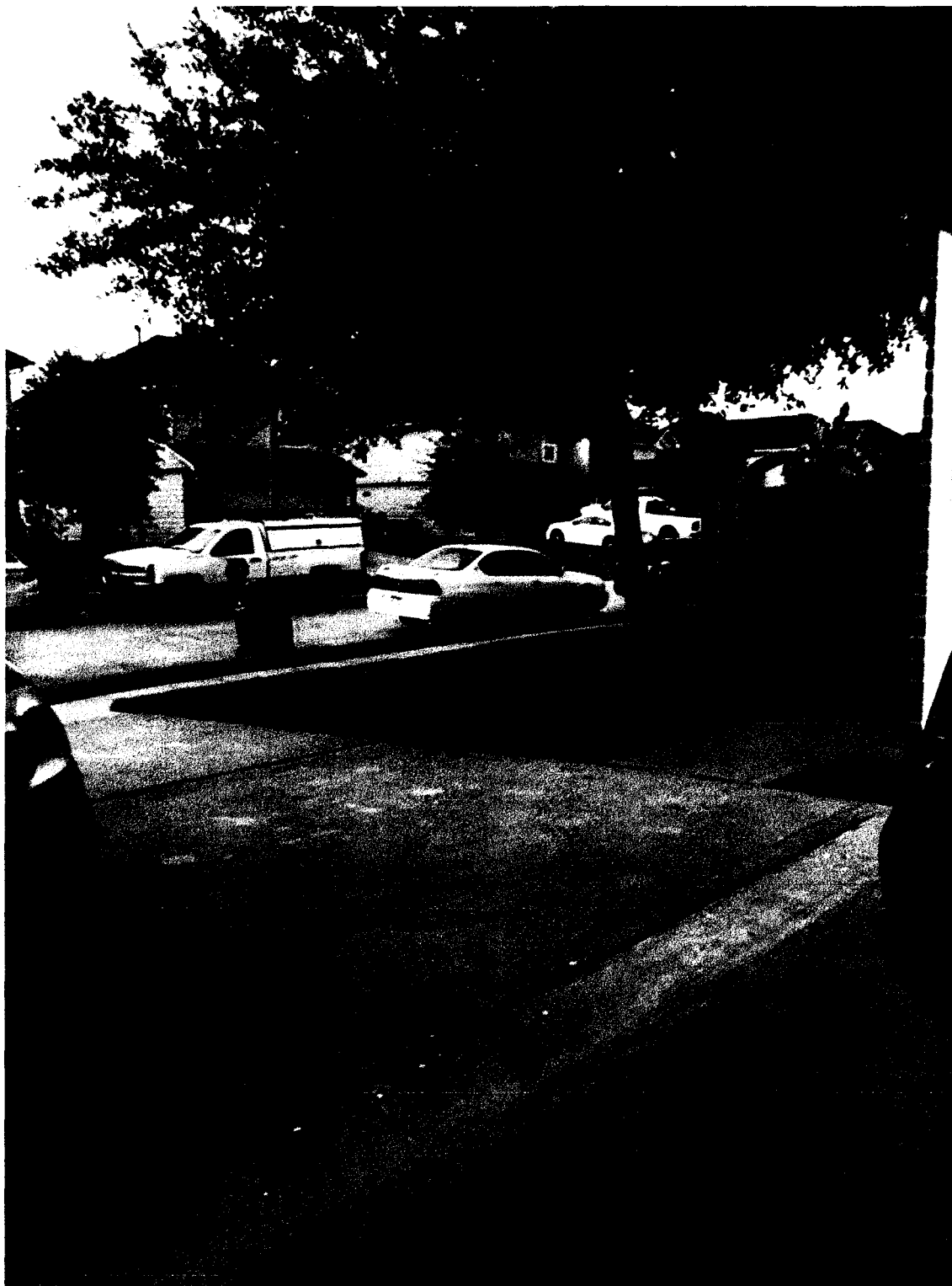


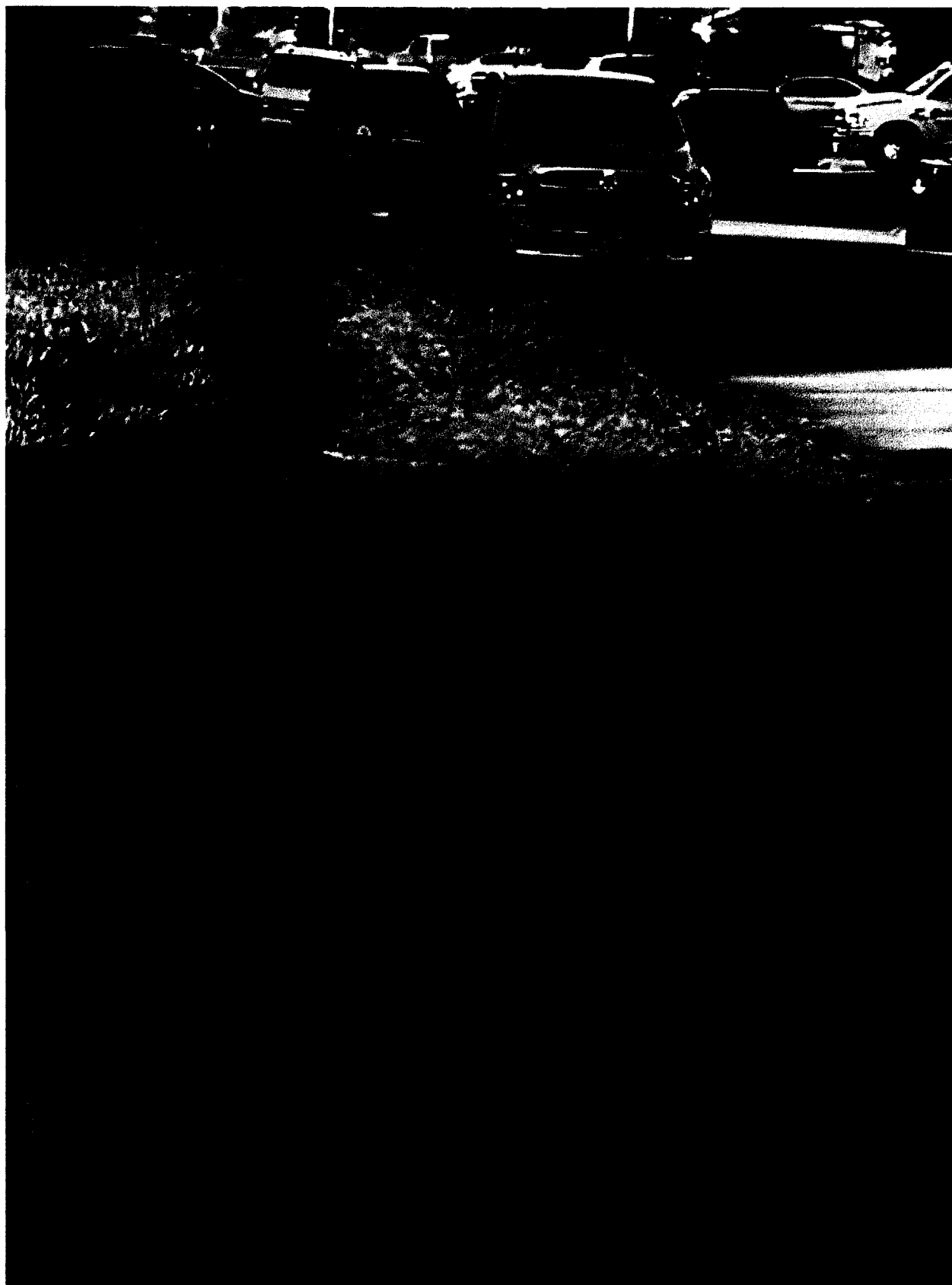


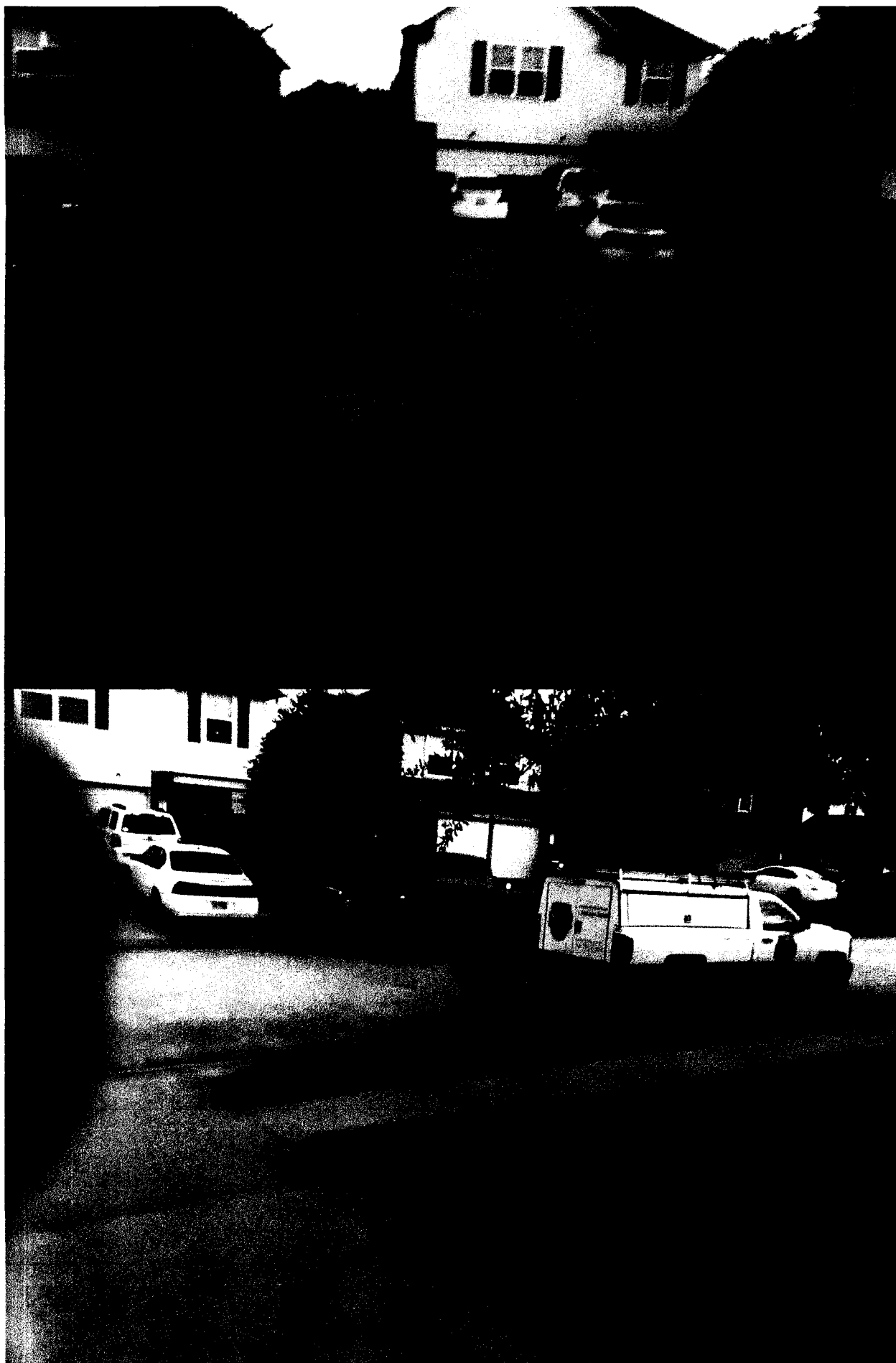




## EXHIBIT E

















**EXHIBIT F****WERRINGTON SUB DIVISION (RENTAL HOMES)****HARRIS COUNTY APPRAISAL DISTRICT ( PARTIAL LIST)****HOMES OWNED BY AMERICAN HOMES FOR RENT**

Your search for owner name : **AMERICAN HOMES** in tax year : [2020] returned **1086** record(s).

1274730040001	AMERICAN HOMES 4 RENT	21630 MICHEALA WAY WERRINGTON	77338	1,412	Pending
1274730040002	AMERICAN HOMES 4 RENT	21626 MICHEALA WAY WERRINGTON	77338	1,124	Pending
1274730040003	AMERICAN HOMES 4 RENT	21622 MICHEALA WAY WERRINGTON	77338	1,752	Pending
1274730040004	AMERICAN HOMES 4 RENT	21618 MICHEALA WAY WERRINGTON	77338	2,060	Pending
1274730040005	AMERICAN HOMES 4 RENT	21614 MICHEALA WAY WERRINGTON	77338	1,991	Pending
1274730040006	AMERICAN HOMES 4 RENT	21610 MICHEALA WAY WERRINGTON	77338	1,124	Pending
1274730040007	AMERICAN HOMES 4 RENT	21606 MICHEALA WAY WERRINGTON	77338	1,455	Pending
1274730040008	AMERICAN HOMES 4 RENT	21602 MICHEALA WAY WERRINGTON	77338	1,812	Pending
1274730040009	AMERICAN HOMES 4 RENT	21550 MICHEALA WAY WERRINGTON	77338	1,412	Pending
1274730030085	AMERICAN HOMES 4 RENT	21503 DONATA CIR WERRINGTON	77338	1,812	Pending
1274730030086	AMERICAN HOMES 4 RENT	21507 DONATA CIR WERRINGTON	77338	1,124	Pending
1274730030087	AMERICAN HOMES 4 RENT	21511 DONATA CIR WERRINGTON	77338	2,060	Pending
1274730030089	AMERICAN HOMES 4 RENT	21519 DONATA CIR WERRINGTON	77338	1,964	Pending
1274730030090	AMERICAN HOMES 4 RENT	21523 DONATA CIR WERRINGTON	77338	1,455	Pending
1274730030091	AMERICAN HOMES 4 RENT	21603 DONATA CIR WERRINGTON	77338	1,124	Pending
1274730030092	AMERICAN HOMES 4 RENT	21607 DONATA CIR WERRINGTON	77338	1,432	Pending
1274730030093	AMERICAN HOMES 4 RENT	21611 DONATA CIR WERRINGTON	77338	1,812	Pending
1274730030017	AMERICAN HOMES 4 RENT	3403 MARIS WAY WERRINGTON	77338	1,440	Pending
1274730030018	AMERICAN HOMES 4 RENT	3407 MARIS WAY WERRINGTON	77338	1,211	Pending
1274730030019	AMERICAN HOMES 4 RENT	3411 MARIS WAY WERRINGTON	77338	1,715	Pending
1274730030020	AMERICAN HOMES 4 RENT	3415 MARIS WAY WERRINGTON	77338	1,385	Pending
1274730030021	AMERICAN HOMES 4 RENT	3419 MARIS WAY WERRINGTON	77338	1,854	Pending
1274730030010	AMERICAN HOMES 4 RENT	21526 ORNELLA CIR WERRINGTON	77338	1,412	Pending
1274730040028	AMERICAN HOMES 4 RENT	21527 ORNELLA CIR WERRINGTON	77338	1,964	Pending
1274730040034	AMERICAN HOMES 4 RENT	21619 ORNELLA CIR WERRINGTON	77338	1,812	Pending
1274730040035	AMERICAN HOMES 4 RENT	21623 ORNELLA CIR WERRINGTON	77338	2,060	Pending
1274730040036	AMERICAN HOMES 4 RENT	21627 ORNELLA CIR WERRINGTON	77338	1,844	Pending
1274730040037	AMERICAN HOMES 4 RENT	21631 ORNELLA CIR WERRINGTON	77338	1,412	Pending
1274730040038	AMERICAN HOMES 4 RENT	21630 NELLA CIR WERRINGTON	77338	1,991	Pending
1274730040039	AMERICAN HOMES 4 RENT	21626 NELLA CIR WERRINGTON	77338	1,124	Pending
1274730040040	AMERICAN HOMES 4 RENT	21622 NELLA CIR WERRINGTON	77338	1,812	Pending
1274730040041	AMERICAN HOMES 4 RENT	21618 NELLA CIR WERRINGTON	77338	2,060	Pending
1274730040042	AMERICAN HOMES 4 RENT	21614 NELLA CIR WERRINGTON	77338	1,412	Pending
1274730040043	AMERICAN HOMES 4 RENT	21610 NELLA CIR WERRINGTON	77338	1,812	Pending
1274730040044	AMERICAN HOMES 4 RENT	21606 NELLA CIR WERRINGTON	77338	1,124	Pending
1274730040045	AMERICAN HOMES 4 RENT	21602 NELLA CIR WERRINGTON	77338	1,991	Pending
1274730040046	AMERICAN HOMES 4 RENT	21522 NELLA CIR WERRINGTON	77338	1,455	Pending

1274730040030	AMERICAN HOMES 4 RENT	21603 ORNELLA CIR WERRINGTON	77338	1,455	Pending
1274730040048	AMERICAN HOMES 4 RENT	21514 NELLA CIR WERRINGTON	77338	1,812	Pending
1274730040049	AMERICAN HOMES 4 RENT	21510 NELLA CIR WERRINGTON	77338	2,060	Pending
1274730040050	AMERICAN HOMES 4 RENT	21506 NELLA CIR WERRINGTON	77338	1,124	Pending
1274730040056	AMERICAN HOMES 4 RENT	21519 NELLA CIR WERRINGTON	77338	1,124	Pending
1274730040057	AMERICAN HOMES 4 RENT	21523 NELLA CIR WERRINGTON	77338	1,775	Pending
1274730040058	AMERICAN HOMES 4 RENT	21603 NELLA CIR WERRINGTON	77338	1,412	Pending
1274730040059	AMERICAN HOMES 4 RENT	21607 NELLA CIR WERRINGTON	77338	1,964	Pending
1274730040060	AMERICAN HOMES 4 RENT	21611 NELLA CIR WERRINGTON	77338	1,455	Pending
1274730040061	AMERICAN HOMES 4 RENT	21615 NELLA CIR WERRINGTON	77338	1,991	Pending
1274730040062	AMERICAN HOMES 4 RENT	21619 NELLA CIR WERRINGTON	77338	1,775	Pending
1274730040063	AMERICAN HOMES 4 RENT	21623 NELLA CIR WERRINGTON	77338	1,455	Pending
1274730040064	AMERICAN HOMES 4 RENT	21627 NELLA CIR WERRINGTON	77338	1,964	Pending
1274730040065	AMERICAN HOMES 4 RENT	21631 NELLA CIR WERRINGTON	77338	1,412	Pending
1274730050001	AMERICAN HOMES 4 RENT	3314 MARIS WAY WERRINGTON	77338	1,964	Pending
1274730050002	AMERICAN HOMES 4 RENT	3318 MARIS WAY WERRINGTON	77338	1,854	Pending
1274730050003	AMERICAN HOMES 4 RENT	3322 MARIS WAY WERRINGTON	77338	1,998	Pending
1274730050004	AMERICAN HOMES 4 RENT	3326 MARIS WAY WERRINGTON	77338	1,986	Pending
1274730040052	AMERICAN HOMES 4 RENT	21503 NELLA CIR WERRINGTON	77338	1,775	Pending
1274730040054	AMERICAN HOMES 4 RENT	21511 NELLA CIR WERRINGTON	77338	2,060	Pending
1274730050009	AMERICAN HOMES 4 RENT	3406 MARIS WAY WERRINGTON	77338	1,854	Pending
1274730050010	AMERICAN HOMES 4 RENT	3410 MARIS WAY WERRINGTON	77338	1,964	Pending
1274730050011	AMERICAN HOMES 4 RENT	3414 MARIS WAY WERRINGTON	77338	1,986	Pending
1274730050034	AMERICAN HOMES 4 RENT	3622 MARIS WAY WERRINGTON	77338	1,854	Pending
1274730050036	AMERICAN HOMES 4 RENT	3630 MARIS WAY WERRINGTON	77338	1,986	Pending
1274730060036	AMERICAN HOMES 4 RENT	3319 FIORELLA WAY WERRINGTON	77338	2,380	Pending
1274730060044	AMERICAN HOMES 4 RENT	21631 MICHEALA WAY WERRINGTON	77338	1,991	Pending
1274730060045	AMERICAN HOMES 4 RENT	21627 MICHEALA WAY WERRINGTON	77338	1,960	Pending
1274730060047	AMERICAN HOMES 4 RENT	21619 MICHEALA WAY WERRINGTON	77338	1,775	Pending
1274730060048	AMERICAN HOMES 4 RENT	21615 MICHEALA WAY WERRINGTON	77338	1,496	Pending
1274730060056	AMERICAN HOMES 4 RENT	21535 MICHEALA WAY WERRINGTON	77338	1,412	Pending
1274730060057	AMERICAN HOMES 4 RENT	21531 MICHEALA WAY WERRINGTON	77338	1,455	Pending
1274730060059	AMERICAN HOMES 4 RENT	21523 MICHEALA WAY WERRINGTON	77338	1,833	Pending
1274730060060	AMERICAN HOMES 4 RENT	21519 MICHEALA WAY WERRINGTON	77338	1,986	Pending
1274730060065	AMERICAN HOMES 4 RENT	3308 MARIS WAY WERRINGTON	77338	1,964	Pending
1274730060062	AMERICAN HOMES 4 RENT	3302 MARIS WAY WERRINGTON	77338	1,986	Pending
1274730060063	AMERICAN HOMES 4 RENT	3304 MARIS WAY WERRINGTON	77338	1,833	Pending